

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

v.

WILLIAM E. BARONI, JR. and  
BRIDGET ANNE KELLY

Case No.: 15-cr-193 (SDW)

**DEFENDANTS' JOINT  
NOTICE OF MOTION  
FOR A MISTRIAL PURSUANT TO  
FEDERAL RULE OF CRIMINAL  
PROCEDURE 26.3**

TO: Lee M. Cortes, Jr., Ass't U.S. Attorney  
United States Attorney's Office  
970 Broad Street  
Newark, NJ 07102

PLEASE TAKE NOTICE that William E. Baroni, Jr., (Michael A. Baldassare, Esq., appearing) and Bridget Anne Kelly (Michael Critchley, Esq., appearing) hereby move for a mistrial pursuant to Federal Rule of Criminal Procedure 26.3.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Mr. Baroni and Ms. Kelly rely upon the brief filed herewith, a reply brief, and oral argument.

By: /s/ Michael Baldassare  
Michael Baldassare, Esq.

**BALDASSARE & MARA, LLC**  
570 Broad Street  
Newark, New Jersey 07102  
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*Attorneys for William E. Baroni, Jr.*

Date: November 3, 2016